

The Honorable Ricardo S. Martinez
The Honorable Brian A. Tsuchida

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
SEATTLE, WASHINGTON

John Samuel Ferrari Rivera,
Petitioner,

v.

Bryan Wilcox, et al.,
Respondents.

NO. 2:19-CV-00385 RSM-BAT

STIPULATION AND ORDER RE:
EXTENSION OF TIME FOR
PARTIES' OBJECTIONS TO REPORT
AND RECOMMENDATION

STIPULATION

The parties have conferred and hereby STIPULATE and AGREE to the following schedule regarding filing of the parties' objections to the Report and Recommendation: the objections shall be filed by October 28, 2019, and should be renoted for Friday, November 1, 2019. Mr. Ferrari demonstrates good cause for this request: Yesterday, October 8, a bond hearing was scheduled in his case for October 17, 2019. Mr. Ferrari asserts that his current detention, which began on March 8, 2019, is now "prolonged." *See Zadvydas v. Davis*, 121 S.Ct. 2491 (2001) (detention in excess of 180 days is presumptively

1 “prolonged”). If the Immigration Judge (“I.J.”) sets bond, several issues in the present case
2 may become moot, including whether the I.J. has jurisdiction to set bond. Moreover,
3 granting an extension will conserve both the parties’ and the court’s resources.

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5 Respectfully submitted this 9th day of October 2019,

6 /s/ Lori Walls

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12 ORDER

13 Based upon the foregoing stipulation of the parties, IT IS SO ORDERED. The
14 Clerk is directed to send copies of this Order to all counsel of record.

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16 DATED this 16 day of October 2019.

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19 RICARDO S. MARTINEZ
CHIEF UNITED STATES DISTRICT JUDGE

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STIPULATION AND ORDER RE:
SCHEDULE FOR PARTIES' OBJECTIONS TO
REPORT & RECOMMENDATION - 3

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